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8 *Ltd., and Samsung Electronics America, Inc.*

9 IN THE UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 IN RE: CATHODE RAY TUBE (CRT)
14 ANTITRUST LITIGATION

Case No. 3:07-cv-5944 SC

MDL No. 1917

15 This Document Relates To:
16 DIRECT PURCHASER ACTIONS
17
18
19

**DECLARATION OF IAN SIMMONS IN
SUPPORT OF MOTION TO ADOPT
SPECIAL MASTER'S REPORT AND
RECOMMENDATION REGARDING
DEFENDANTS' JOINT MOTION FOR
SUMMARY JUDGMENT**

1 I, Ian Simmons, declare as follows:

2 1. I am an attorney with O'Melveny & Myers LLP, attorneys for Samsung
3 Electronics Co., Ltd., and Samsung Electronics America, Inc. in this action. I am a member of
4 the bar of the District of Columbia and am admitted to practice before this Court *pro hac vice*. I
5 make this Declaration in support of Defendants' Motion to Adopt Special Master's Report and
6 Recommendation Regarding Defendants' Joint Motion for Summary Judgment. If called as a
7 witness, I could, and would, testify to the matters set forth in this declaration of my own personal
8 knowledge.

9 2. Attached hereto as Exhibit 1 is a true and accurate copy of the March 20, 2012
10 transcript of proceedings before Special Master Charles A. Legge.

11 3. Attached hereto as Exhibit 2 is a true and accurate copy of a July 17, 2012 letter to
12 Eva W. Cole and Molly M. Donovan from Philip J. Iovieno on behalf of Direct Action Plaintiffs
13 in this case.

14 4. Attached hereto as Exhibit 3 is a true and accurate copy of Defendants' Joint
15 Motion for Summary Judgment Against Purported Direct Purchaser Plaintiffs Who Did Not
16 Purchase CRTs and Memorandum of Points and Authorities in Support [Dkt. No. 1013] (Dec. 12,
17 2011).

18 5. Attached hereto as Exhibit 4 is a true and accurate copy of the December 12, 2011
19 Declaration of Molly M. Donovan in Support of Defendants' Joint Motion for Summary
20 Judgment Against Purported Direct Purchaser Plaintiffs Who Did Not Purchase CRTs [Dkt. No.
21 1013-1] (filed Dec. 12, 2011) ("Donovan Declaration"), as well as Exhibits A through J to the
22 Donovan Declaration.

23 6. Attached hereto as Exhibit 5 is a true and accurate copy of Direct Purchaser
24 Plaintiffs' Memorandum of Points and Authorities in Opposition to Defendants' Motion for
25 Partial Summary Judgment [Dkt. No. 1245] (July 2, 2012), as redacted by the filing parties.

26 7. Attached hereto as Exhibit 6 is a true and accurate copy of Direct Action
27 Plaintiffs' Memorandum in Support of the Direct Purchaser Plaintiffs' Opposition to Defendants'
28 Motion for Partial Summary Judgment [Dkt. No. 1056] (Feb. 24, 2012).

Dated: July 24, 2012

/s/ Ian Simmons
Ian Simmons